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Attorneys for Defendant  
BMW OF NORTH AMERICA, LLC

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

NEAL ADAMS,

Plaintiff,

vs.

BMW OF NORTH AMERICA, LLC; and  
DOES 1 through 30, inclusive,

Defendants.

Case No.

[Removed from Alameda County Sup. Ct.  
Case No. RG21115137]

**CORPORATE DISCLOSURE  
STATEMENT OF DEFENDANT BMW  
OF NORTH AMERICA, LLC, AND  
CERTIFICATION OF INTERESTED  
PARTIES**

*[Notice of Removal; Civil Cover Sheet; Notice  
of Appearance; Declaration of Mark W. Allen  
filed concurrently herewith]*

Complaint Filed: October 7, 2021  
Complaint Served: October 8, 2021  
Trial Date: None Set

1           **TO THE COURT, ALL PARTIES AND THEIR ATTORNEYS OF RECORD,**  
 2           **PLEASE TAKE NOTICE OF THE FOLLOWING:**

3           **CORPORATE DISCLOSURE STATEMENT OF DEFENDANT**

4           **BMW OF NORTH AMERICA, LLC**

5           1.       BMW of North America, LLC (“BMW NA”) is a privately held Delaware limited  
 6 liability company with its principal place of business located in Woodcliff Lake, New Jersey.  
 7 BMW NA is a member-managed limited liability company, and is a wholly owned subsidiary of  
 8 BMW (US) Holding Corporation, which is the sole member of BMW NA. BMW (US) Holding  
 9 Corporation is a privately held Delaware corporation with its principal place of business located in  
 10 Woodcliff Lake, New Jersey. BMW (US) Holding Corporation is a wholly owned subsidiary of  
 11 BMW AG. BMW AG is a publicly held German corporation with its principal place of business  
 12 located in Munich, Germany. No parent corporation or publicly held corporation owns 10% or  
 13 more of BMW AG’s stock.

14          2.       Pursuant to Federal Rule of Civil Procedure Rule 7.1(b)(2), BMW NA will promptly  
 15 file a supplemental disclosure statement if any required information changes.

16           **CERTIFICATION OF INTERESTED PARTIES**

17          3.       Please take notice that, pursuant to Federal Rule of Civil Procedure 7.1, the  
 18 undersigned counsel of record for Defendant BMW of North America, LLC, certifies that the  
 19 following listed parties may have a pecuniary interest in the outcome of this case. These  
 20 representations are made to enable the Court to evaluate possible disqualification or recusal.

21                   a.       Defendant BMW of North America, LLC; and

22                   b.       Plaintiff Neal Adams.

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1           4.       BMW NA will promptly file an amended certification if any additional interested  
2 parties are identified, or if any material change occurs in the status of these interested parties.

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4 Dated: November 8, 2021

MORGAN, LEWIS & BOCKIUS LLP  
Molly Moriarty Lane  
Mark W. Allen  
Kevin M. Benedicto

7 By: /s/ Mark W. Allen

8 Mark W. Allen

9 Attorneys for Defendant  
10 BMW of North America, LLC  
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